

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,
Plaintiff,

v.

TIMOTHY CALLAHAN, FRANCIS M.
ROACHE, PAUL MURPHY,
RICHARD WALSH, and
THE CITY OF BOSTON,
Defendants.

C.A. NO. 04-11193NG

**DEFENDANTS' JOINT MOTION TO SEAL
EMERGENCY MOTION TO COMPEL DEPOSITION OF FACT
WITNESS ROSEMARY CURRAN SCAPICCHIO, ESQ.**

NOW COME the Defendants, Richard Walsh, Timothy Callahan, Francis M. Roache, Estate of Paul Murphy and The City of Boston (collectively "Defendants"), and hereby request that this Honorable Court seal Defendants' Emergency Joint Motion to Compel Deposition of Fact Witness Rosemary Curran Scapicchio, Esq., and the supporting memorandum and exhibits. As grounds in support herein, the Defendants state that the documents should be sealed to prevent prejudicial pretrial publicity and to protect the privacy interests of third parties. *See U.S. v. Salemme*, 985 F.Supp. 193, 195 (D.Mass. 1997).

WHEREFORE, the Defendants respectfully request this Honorable Court allow the Defendants' Emergency Joint Motion to Compel Deposition of Fact Witness Rosemary Curran Scapicchio, Esq., be filed under seal.

Respectfully submitted,

Defendant Richard Walsh,
Through his attorney,



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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document has been mailed, this 2nd day of February, 2007 to all counsel of record:

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